

SPEAK UP POLICY OF REDCARE PHARMACY N.V.

INTRODUCTION

At Redcare Pharmacy, we are committed to responsible business practices and high ethical standards. We act in accordance with our Code of Conduct and with applicable laws and regulations of the countries where we operate.

In your daily work, you may be confronted with ethical concerns or dilemmas or unethical behaviour. If you observe something that worries you, or that seems to violate our Code of Conduct, we encourage you to Speak Up to help us address the situation proactively.

We understand it takes courage to speak up, so therefore we are committed to providing you with an easy and safe way to voice your concerns. In this document, our **Speak Up Policy**, we explain what your options are and how you can raise your concerns.

Our Speak Up Policy is an essential part of our Redcare culture that enables us to protect our people, our company values, our stakeholders and society as a whole.

SCOPE

This Speak Up Policy describes how you can “speak up” about suspected breaches of our Code of Conduct. It further describes the process so that you know what to expect, and the ways you will be protected when speaking up (confidentiality, anonymity, non-retaliation). Our Speak Up Policy applies to employees and other stakeholders.

WHEN DO YOU SPEAK UP?

As soon as possible, or as soon as you suspect that there has been a violation of the Code of Conduct, company values or any company policy. You are also encouraged to speak up about anything that does not constitute ethical, compliant or lawful behaviour. This policy gives you a reference point to determine if something is not right.

Examples are: bribery, fraud, corruption, human rights violations, discrimination, harassment, threat to public health or environmental safety, failure to comply with obligations related to data security, misuse of company assets, misrepresentation or manipulation of information.

Not covered by this process are personal complaints or disputes under labour law. In these cases, please contact your manager, HR or Confidants.



HOW DO YOU SPEAK UP?

You can speak up, provide information or ask questions in several ways. In many situations, talking directly to the person involved could be a good first step. Our Speak Up Policy should under no circumstance replace the direct dialogue among co-workers and management that forms the foundation of our transparent company culture. However, we recognise that this is not always easy to do.

If you want to raise a concern or report a violation of our Company Code of Conduct in any form, then please use one of the following Speak Up channels:

1. First go to person involved, to your manager or your manager's manager
2. If that does not resolve your issue, go to your local HR contact, one of our Trusted Persons, or our Corporate Compliance team
3. If the previous steps are not options for you, go to our Speak Up Line which is operated by an independent service provider and available 24/7 in your own language and, if desired, remain anonymous:
 - i) Via phone
 - ii) Via the Speak Up portal
 - iii) or the Speak Up app

You will find more detailed information like links and telephone numbers in **Annex 1**.

In case you are confronted with inappropriate behaviour such as sexual harassment, discrimination, bullying, aggression or violence, please consult our Protocol on Transgressive Behaviour to learn what you can do about it. If, after careful consideration, you do not feel comfortable to Speak Up within the company, it is possible to raise your concern outside the company. To understand all conditions involved, please see the website of the competent authorities in your country of residence. Whenever you are considering such a significant step, we strongly recommend you seek advice and not do this on your own. Above all, we encourage you to Speak Up within the company. This way you can hand the burden over to us, and we have the opportunity to look into the matter immediately.

YOU SPOKE UP. WHAT'S NEXT?

Once you have submitted your report through our Speak Up Line, our Speak Up Office, which has been established to handle all concerns and issues raised, will send you an acknowledgement of receipt within seven days. Your report will be evaluated and assessed, and the appropriate course of action will be determined. You will then receive feedback within (ultimately) three months after acknowledgement of receipt. In some situations, follow up questions may be necessary.

Not all reports will automatically result in a formal investigation. Sometimes, another course of action is better for all involved parties (e.g. mediation). Furthermore, depending on the issue raised, there might be insufficient information for an adequate investigation to take place when there is no possibility of obtaining further information.



You will be informed on the status of your report. Please note that we may not always be able to give you details of the outcome of the investigations for reasons of confidentiality, privacy and the legal rights of the parties involved. All those involved, including the accused, are entitled to confidentiality. Therefore, if you participate in or learn about an investigation, you must always keep the matter confidential.

PROTECTION WHEN YOU SPEAK UP

Confidentiality

All questions or issues raised by you are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis. Depending on the purpose of sharing, the Speak Up Office will (further) anonymise the information prior to sharing it. Information will only be shared outside of this group if we are required to do so by law or an important public interest is at stake.

In principle, we are obliged to inform as soon as possible any person under investigation that he or she is the subject of a report being investigated. This may be delayed if there is a substantial risk that the notification jeopardizes the investigation or the gathering of evidence. Your identity will not be disclosed.

Regardless of all measures taken to protect your confidentiality, it can never be fully guaranteed that during the course of an investigation you will never be implicated by someone else involved.

Solid Investigation Procedures

The Speak Up Office, and respective experts who are assigned to be involved in the investigation, are responsible for solid, confidential and precise fact-finding.

Anonymity

You can share information anonymously by using our Speak Up Line. This offers you the best protection. Please note that the Speak Up Office also has the responsibility to anonymise any information supplied in order to protect your identity.

The Speak Up Line makes safe dialogue possible in an anonymous way. An anonymous letter does not offer any possibility of further correspondence, hence any anonymous letter or e-mail outside the Speak Up Line cannot be handled.

Safeguarding Your Privacy

Our company is committed to protecting the privacy of everyone involved in the Speak Up process. We will do everything within reason to safeguard personal data from unauthorized access and processing. Any personal data obtained will be processed in line with our privacy policy and will only be used for the purposes explained in this policy or to comply with the law or an important public interest.

Non-retaliation

We encourage you to speak up and any person that speaks up is protected. The right of non-retaliation is guaranteed under the Code of Conduct and violation of this right will not be tolerated. Any form of threat or retaliation aimed at those speaking up may lead to disciplinary measures. If you notice or experience any retaliation, you can report this via one of our Speak Up channels.



PROTECTING YOU, AS THE ACCUSED

A person who is the subject of a report needs our utmost protection. The presumption of innocence is a leading principle. The Speak Up Office is responsible for protecting the rights of anyone who is accused - or otherwise involved - in any issue.

Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis.

Solid Investigation Procedures

The Speak Up Office is responsible for solid, confidential and precise fact-finding. We selected the Speak Up Line as a reporting channel since it allows for anonymous dialogue with the person reporting an issue. However, the Speak Up Office has the right to not proceed with a report due to limited information.

Information Rights

When a person is officially under investigation, he or she must be notified about the investigation as soon as possible, unless there is a substantial risk of destruction of evidence and/or an impediment to the investigation.

Right to Defend and Appeal

After the facts are determined, the person facing accusations receives an opportunity to not only give a statement responding to the accusations, but also has the right to comment on the draft findings. The subject of any investigation has the right to appeal the claims against him or her as long as it takes place during the time that the report is being investigated.

THE SPEAK UP OFFICE

The Speak Up Office consists of qualified professionals from the organisation. You can find the contact details of the Speak Up Office in Annex 2.

The Speak Up Office is responsible for the execution of our Speak Up Policy and the handling of all related questions and Speak Up reports. All reports coming in through the Speak Up Line and all reports via other channels will be made available to the Speak Up Office. The Speak Up Office registers, monitors and is responsible for solid, confidential and precise fact-finding.

The Speak Up Office categorizes the reports by topic and severity, and will onboard and assign investigations to internal or external experts and/or other investigators. At the discretion of the Speak Up Office, a complaints committee may be installed consisting of internal and external experts and/or advisors.

The Director, Corporate Compliance & Governance, is accountable for the Speak Up Policy overall, and has a direct escalation line to the Chairman of the Supervisory Board. All members of the Speak Up Office are also safeguarded from retaliation under our policy.

The Speak Up Office will provide an anonymised report to the Supervisory Board. If applicable, explicitly included in the report are issues raised on non-retaliation and complaints on the handling of reports by the Speak Up Office.



MISUSE

We take the practice of reporting in bad faith or any other form of misuse of this policy very seriously. This act is considered to be a serious breach of the Code of Conduct and disciplinary actions will be taken.

COMPLAINTS ABOUT OUR SPEAK UP PROCESS

If you believe your concerns have not been handled accordingly, if you are not satisfied with the follow-up and/or the outcome of your report or if you do not feel protected, please report this directly to the Speak Up Office or through the Speak Up Line.

If your concern relates to the Compliance Officer in particular, you may also address your concern in a letter to the Chairman of the Supervisory Board.

You are free to pursue your legal rights and access all available judicial mechanisms, in parallel with, or following Redcare's considerations of your concern.

CONTACT

The Speak Up Office is your main point of contact for any questions. Find the contact details in **Annex 2**.



Annex 1 – Speak Up Line

1. Via Phone

When you wish to report an issue/incident via phone, you can use the local phone number of your country. When calling the local number, you will be asked to dial the organisation code. This organisation code for Redcare Pharmacy is: **109441**. This code is needed to direct your report to the Redcare Speak Up Office for case handling.

Please note that you will not speak with an operator on the phone. You will get voice recorded instructions. First you will be provided with a unique case number and you will be requested to create a four-number password. Keep this password safe, since it provides you with the only access to follow up on your report with the Speak Up Office. Your recording will be translated into a written message, which will be submitted to the Speak Up Office.

Country	Phone number	Phone instructions
Austria	800909683	Freephone: 0800 909 683
France	0805543753	Freephone: 080 554 3753
Switzerland	0800005691	Freephone: 080 000 5691
Netherlands	0031107007503	Number: +31 10 700 75 03
Italy	800147694	Freephone: 800 147 694
Belgium	080089326	Freephone: 0800 89 326
Germany	08001818952	Freephone: 0800 1818 952

2. Web browser:

By clicking on the following URL, you will be directed to the Redcare Speak Up webpage.

<https://redcarepharmacy.speakup.report/en-GB/redcarepharmacy/home>

First, you can select your preferred language. You can then follow the steps on the webpage to submit a written report. You will be requested to create a password. Keep this password safe, since it provides you with the only access to the secured and confidential portal where you can communicate with the Speak Up Office.

3. Via the app

If you wish to submit a report via the SpeakUp app, you can download the app on both Google Play and App store (“SpeakUp by People Intouch”). You will either be requested to scan the QR code below, or manually type in the organisation code. The organisation code for Redcare Pharmacy is: **109441**. The QR code or organisation code will direct your message to the Redcare Speak Up Office for case handling.





Annex 2 – Useful contact details

The Speak Up Office is owned by the Director Corporate Compliance & Governance, Mathilde Alberts.